



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 20, 2008

MEMO ENDORSED

By Hand

The Honorable Colleen McMahon
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 640
New York, New York 10007

6/20/08
JK
Colleen McMahon

Re: United States v. Efrain Carrasquillo et al.
07 Cr. 1076 (CM)

Dear Judge McMahon:

A status conference in the above-captioned matter is presently scheduled for May 22, 2008, at 9:30 a.m.

With respect to defendants Efrain Carrasquillo and Juan De Jesus, the parties have been actively discussing a possible resolution of this case. Accordingly, the Government, joined by Alan Nelson, Esq., counsel for defendant Efrain Carrasquillo, and Susan V. Tipograph, Esq., counsel for defendant Juan De Jesus, respectfully request an adjournment of the upcoming status conference until May 30, 2008 at 9:30 a.m., in order to allow these discussions to continue.

Should Your Honor grant the request for an adjournment, the Government also respectfully requests that, with respect to defendant Carrasquillo, the Court exclude time from May 22, 2008, until May 30, 2008, pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(8)(A). The ends of justice served by such continuance outweigh the interest of the

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #
DATE FILED: 5/21/08

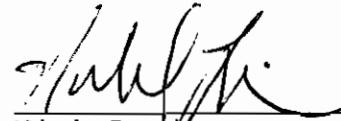
The Honorable Colleen McMahon
May 20, 2008
Page 2 of 2

public and the defendants in a speedy trial because the continuance will allow the parties to continue to engage in discussions regarding a potential disposition. Defense counsel for Efrain Carrasquillo and Juan De Jesus consent to this request for the exclusion of time.

Respectfully submitted,

MICHAEL J. GARCIA
United States Attorney

By:


Nick Lewin
Assistant U.S. Attorney
(212) 637-2337

cc by fax:

Alan M. Nelson, Esq.
Attorney for Defendant Efrain Carrasquillo

Susan V. Tipograph
Attorney for Defendant Juan De Jesus